

**DEPARTMENT OF CONSUMER AFFAIRS  
BOARD OF PSYCHOLOGY**

**INITIAL STATEMENT OF REASONS**

**Hearing Date:** May 6, 2006

**Subject Matter of Proposed Regulations:** Supervised Professional Experience;  
Registered Psychologists

**Sections Affected:** 1387 and 1390.3

**Specific Purpose of each adoption, amendment, or repeal:**

The proposed amendment to section 1387 is to make specific changes pursuant to SB 229, Chapter 658, Statutes of 2005 to add acceptable postdoctoral supervised professional experience for applicants in a formal postdoctoral internship. The proposed amendment to section 1390.3, also pursuant to SB 229, would extend the period of an exemption for those applicants working in an exempt setting as registered psychologists from 2 years to 30 months. Lastly, section 1387(b)(9) is being amended to delete reference to the word "credential" as this reference disallows supervised professional experience hours accrued at a public school by a person working as a school psychologist.

**Factual Basis/Rationale**

Currently, existing section 1387(a)(2) allows applicants for licensure as a psychologist to accrue postdoctoral supervised professional experience as follows:

- As a registered psychologist pursuant to section 2909(d) of the code and registration with the board prior to commencing work is required; or
- As an employee of an exempt setting pursuant to section 2910 of the code and registration with the board is not required; or
- As a psychological assistant pursuant to section 2913 of the code and registration with the board prior to commencing work is required; or
- Pursuant to a Department of Mental Health Waiver (5751.2 Welfare and Institutions Code) for which registration with the board is not required.

Pursuant to SB 229, Chapter 658, Statutes of 2005, this proposal would add the following acceptable postdoctoral supervised professional experience:

- In a formal postdoctoral internship overseen by the American Psychological Association (APA), the Association of Psychology Postdoctoral and Internship Centers (APPIC), or the California Psychology Internship Council (CAPIC) pursuant to section 2911 of the code and registration with the board is not required.

The definition of “formal internship” is being relocated under section 1387(a)(1)(A) to be consistent with the predoctoral supervised professional experience.

Currently, section 1387(b)(9) states that *“SPE gained while the trainee is functioning under another mental health license or credential, shall not be credited toward meeting the requirements for the psychologist’s license.”* As it is currently written, this regulation disallows SPE hours accrued at a public school by a person working as a school psychologist since school psychologists are required by California law to have a pupil personnel services credential through the Commission on Teacher Credentialing. Therefore, this proposal would eliminate the words “or credential” in order to accept hours of SPE accrued at a public school by a person working as a school psychologist.

Currently, section 1390.3 states that a person meeting the requirements set forth in Business and Professions Code section 2909(d), may provide psychological services under supervision at a non-profit community agency that receives at least 25 percent of its funding from a governmental source for the purpose of training and providing services so long as that person registers with the board as a registered psychologist. Currently, the registration is valid for two years. This proposal would extend the registration to 30 months from the date of registration as amended in section 2909(d) of the Business and Professions Code pursuant to SB 229, Chapter 658, Statutes of 2005.

### **Underlying Data**

SB 229, Chapter 658, Statutes of 2005 (Attached)

### **Business Impact**

This regulation will not have a significant adverse economic impact on businesses since it does not require applicants to become certified as a board certified specialist with the ABPP. Rather the proposed amendment merely offers applicants for licensure as a psychologist in California another option to streamline the licensing process.

### **Specific Technologies or Equipment**

This regulation does not mandate the use of specific technologies or equipment.

### **Consideration of Alternatives**

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.